

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

IN RE KRAFT HEINZ SECURITIES
LITIGATION

Case No. 1:19-cv-01339

Honorable Jorge L. Alonso

**PLAINTIFFS' MOTION FOR FINAL APPROVAL
OF SETTLEMENT AND PLAN OF ALLOCATION**

Lead Plaintiffs Sjunde AP-Fonden and Union Asset Management Holding AG, and additional named plaintiff Booker Enterprises Pty Ltd. (collectively, "Plaintiffs"), on behalf of themselves and the Settlement Class, respectfully move this Court, under Rule 23(e) of the Federal Rules of Civil Procedure, for entry of a Judgment approving the Settlement as fair, reasonable, and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable.¹

This Motion is based upon (i) the Joint Declaration of Sharan Nirmul and Salvatore J. Graziano in Support of (A) Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation; and (B) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses (and the exhibits thereto), (ii) the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation, and (iii) all other papers and proceedings herein. A proposed Judgment and a proposed Order granting the requested relief will be submitted with Plaintiffs' reply papers after the deadline for objecting to the Settlement and requesting exclusion from the Settlement Class has passed.

¹ All capitalized terms not defined herein have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated May 2, 2023 (ECF No. 475-3).

Dated: August 8, 2023

Respectfully submitted,

**KESSLER TOPAZ
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/s/ Sharan Nirmul

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